

EXHIBIT 4

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:

The County of Cuyahoga v. Purdue Pharma, et  
al., Case No. 17-OP-45004

City of Cleveland, Ohio v. Purdue Pharma L.P.,  
et al., Case No. 18-OP-45132

The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al., Case No. 18-OP-45090

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Videotaped Deposition of
MATTHEW PAOLINO
December 5, 2018
9:02 a.m.

Taken at:
Akron Bar Association
57 South Broadway Street
Akron, Ohio

Stephen J. DeBacco, RPR

1 Q. Okay. Sir, have you ever used a
2 prescription opioid?

3 A. I have.

4 MR. LEDLIE: I'm going to instruct
5 the witness not to answer as to any of his
6 personal use. It's a privacy issue.

7 MR. DAVISON: And -- and what's the
8 basis for that?

9 MR. LEDLIE: HIPAA.

10 MR. DAVISON: Sorry. Just to make
11 sure I understand the basis.

12 MR. LEDLIE: Health information
13 protection. His personal medical usage is not
14 relevant and has been the same objection that's
15 come up. I understand it hasn't been an issue,
16 but.

17 MR. DAVISON: Okay. I just wanted
18 to make sure that the objection was -- was
19 clear on the record, that you're saying it's
20 a -- it's a HIPAA issue for his personal,
21 whether or not he has used an opioid; not any
22 question about the actual prescription, the
23 reason, or anything like that. But the mere
24 question of yes or no you say is protected by
25 HIPAA?

1 MR. LEDLIE: His personal use of an
2 opioid, I believe, whether he used or did not
3 use an opioid, is protected by HIPAA, yes.

4 MR. DAVISON: Okay. Just wanted to
5 make sure the record was clear.

6 MR. LEDLIE: Sure.

7 MR. DAVISON: Thank you.

8 MR. LEDLIE: No problem.

9 MR. DAVISON: I have nothing
10 further at this time. I do believe that one of
11 my other cocounsel has a question.

12 MR. LEDLIE: Sure.

13 MR. DAVISON: Can we go off the
14 record?

15 THE VIDEOGRAPHER: Off the record
16 at 3:02 p.m.

17 (Off the record.)

18 THE VIDEOGRAPHER: Back on the
19 record at 3:03 p.m.

20 EXAMINATION OF MATTHEW PAOLINO

21 BY MR. BREWER:

22 Q. Good afternoon.

23 A. Good morning -- afternoon.

24 Q. My name is Matt Brewer. I
25 represent Walgreens, and I'll ask a few more